

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TARA RANIERE, NICHOL BODDEN, and
MARK A. VOSBURGH, on behalf of themselves
individually, and on behalf of all similarly-
situated persons,

Plaintiffs,

v.

CITIGROUP INC., CITIBANK, N.A., and
CITIMORTGAGE, INC.,

Defendants.

Civil Action No. 11 CV 2448 (RWS)

DECLARATION OF STACY BYERS

I, Stacy Byers, hereby declare as follows:

1. I am the Stacy A. Byers Human Resources Advisor for Defendant CitiMortgage, Inc. ("Citi"). I work in Citi's 1 Court Square, Long Island City location, and submit this Declaration in support of Defendant's Motion to Compel Arbitration.
2. In 2010, Plaintiff Tara Ranieri's compensation was more than \$363,000 and Plaintiff Nichol Bodden's was more than \$175,000.
3. Attached to this Declaration as Exhibit 1 is a true and correct copy of the sections of Citi's 2011 U.S. Employee Handbook relating to arbitration of employment claims.
4. Attached to this Declaration as Exhibit 2 is a true and correct copy of Plaintiff Nichol Bodden's Acknowledgement of the 2011 U.S. Employee Handbook.
5. Attached to this Declaration as Exhibit 3 is a true and correct copy of Plaintiff Nichol Bodden's Acknowledgment of the 2009 U.S. Employee Handbook.

6. Attached to this Declaration as Exhibit 4 is a true and correct copy of Plaintiff Tara Reniere's Acknowledgement of the 2009 U.S. Employee Handbook.

7. Attached to this Declaration as Exhibit 5 is a true and correct copy of the sections of Citi's 2009 U.S. Employee Handbook relating to arbitration of employment claims.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing information is true and correct.

Dated: May 13, 2011.

By:

Stacy Byers
Stacy Byers